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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 RSA PROTECTIVE TECHNOLOGIES,
12 LLC,

13 Plaintiff,

14 vs.

15 CLARK COUNTY,

16 Defendant.

Case No. 2:20-CV-00143-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND DEFENDANT'S TIME TO
RESPOND TO COMPLAINT**

[FIRST REQUEST]

17 Plaintiff RSA Protective Technologies, LLC ("Plaintiff"), by and through its
18 attorneys of record, the law firms of Kolesar & Leatham and Haug Partners LLP, and
19 Defendant Clark County ("Defendant"), by and through its attorneys, the law firm of
20 Marquis Aurbach Coffing, hereby stipulate and agree as follows:

- 21 1. Plaintiff filed its Complaint [ECF No. 1] on January 21, 2020.
- 22 2. Defendant was served February 7, 2020, making its response to the
23 Complaint due February 28, 2020.
- 24 3. The parties stipulate and agree to extend Defendant's deadline to answer or
25 otherwise respond to the Complaint by sixty (60) days, up to and including April 28, 2020.
- 26 4. The purpose of this extension is to allow Defendant and its counsel to tender
27 defense and indemnification demands to the prime contractors with which Defendant

1 contracted for the bollard project(s), evaluate potential liability of subcontractors for
2 purposes of indemnification demands, and to allow Defendant's counsel sufficient time to
3 investigate the facts surrounding the claims and defenses in this case. Further, the extension
4 will conserve the Court's and the parties' resources.

5 5. This is the first request for an extension of Defendant's deadline to answer or
6 otherwise respond to the Complaint, and the extension is not being sought for improper
7 purposes or to delay.

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1 6. Therefore, in view of the foregoing, the parties respectfully request the Court
2 to allow Defendant's time to respond to the Complaint to be extended by sixty (60) days, up
3 to and including April 28, 2020. *Clark County*

4 Dated this 21st day of February, 2020.

5 MARQUIS AURBACH COFFING

HAUG PARTNERS LLP

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ORDER

IT IS SO ORDERED, this 24th day of February, 2020.


UNITED STATES MAGISTRATE JUDGE